



Alan C. Lloyd, Ph.D.  
Agency Secretary

# State Water Resources Control Board

## Executive Office

Arthur G. Baggett Jr., Chair  
1001 I Street • Sacramento, California 95814 • (916) 341-5615  
Mailing Address: P.O. Box 100 • Sacramento, California • 95812-0100  
Fax (916) 341-5621 • <http://www.waterboards.ca.gov>



Arnold Schwarzenegger  
Governor

SEP 14 2005

Mr. Toby Argandona  
CNI Manufacturing  
15627 Arrow Hwy.  
Irwindale, CA 91706

Dear Mr. Argandona:

### EVALUATION OF CNI MANUFACTURING STAND ALONE DIRECT BURY SPILL CONTAINMENT MODELS 205 AND 214, PHASE I ENHANCED VAPOR RECOVERY SYSTEM

As you know, Assembly Bill 2955 (Statutes 2004, Chapter 649) added section 25290.1.2(a) to Chapter 6.7 of the Health and Safety Code (H&SC). This section requires the Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to certify, to the best of their knowledge and using existing resources, that equipment meeting the ARB's Enhanced Vapor Recovery (EVR) requirements also meets UST statutory requirements.

On July 15, 2005, we received on your behalf the enclosed signed statement by a California Registered Professional Engineer. Based on this statement and the information that CNI Manufacturing provided to us, we have found no evidence that the CNI Manufacturing Stand Alone Direct Bury Spill Containment Models 205 and 214 Phase I EVR System conflicts with H&SC Chapter 6.7. However, the Stand Alone Direct Bury Spill Containment Models 205 and 214 do not meet the secondary containment requirements of H&SC Chapter 6.7 and implementing regulations. Therefore, the Stand Alone Direct Bury Spill Containment Models 205 and 214 can only be used for applications where secondary containment of the fill riser is not required.

This determination assumes the CNI Manufacturing Stand Alone Direct Bury Spill Containment Models 205 and 214 Phase I EVR System is installed in accordance with applicable ARB Executive Orders and in accordance with manufacturer's instructions, as required by State Water Board regulations. Therefore, pursuant to H&SC section 25290.1.2(a), the State Water Board certifies that, to the best of its knowledge, the CNI Manufacturing Stand Alone Direct Bury Spill Containment Models 205 and 214 Phase I EVR System meets the requirements of H&SC Chapter 6.7.

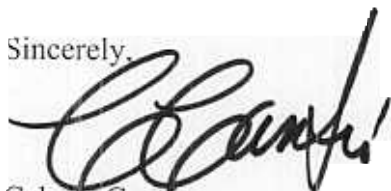
Mr. Toby Argandona

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If you have questions regarding this letter, please contact Raed Mahdi at (916) 341-5871, or via email at [rmahdi@waterboards.ca.gov](mailto:rmahdi@waterboards.ca.gov).

Sincerely,



Celeste Cantu

Executive Director

Enclosure: CNI Manufacturing Stand Alone Direct Bury Spill Containment Models 205 and 214 Phase I EVR System

cc: Ms. Catherine Witherspoon  
Executive Officer  
Air Resources Board  
1001 I Street  
Sacramento, CA 95814

Mr. Don Johnson  
Assistant Secretary  
Cal/EPA  
1001 I Street  
Sacramento, CA 95814



June 27, 2005

## Appendix

**Certification Statement for the CNI Manufacturing  
Stand Alone Spill Containment Models 205 and 214<sup>1</sup>**

Based on a careful review and analysis, I hereby certify that the CNI Manufacturing Stand Alone Spill Containment Models 205 and 214, which is under consideration for California Air Resources Board (ARB) certification, meets the requirements of Chapter 6.7 of the California Health and Safety Code (the State Water Resources Control Board's underground storage tank requirements, including enhanced leak detection and continuous vacuum, pressure, or hydrostatic monitoring.)<sup>2</sup>

The CNI Manufacturing Stand Alone Spill Containment Models 205 and 214 warranties are valid as long as the system is installed, operated and maintained according to manufacturer's instructions and in a manner that does not exceed the limitations (e.g., tank capacity, fueling points, throughputs, etc.) described below.

Limitations:

Refer to Permeability, Compatibility and Warranty Report dated June 16, 2005, Section 3.

Bernie Lingau 6-27-05  
Signed by Date  
(California Professional Engineer)

Bernie M. Lingau (# C 050985)  
Printed Name (California Professional Engineer)

Pacific Petroleum Equipment  
Professional Engineer Company Name

5465 Gaines St., #102  
Mailing Address

San Diego, CA 92110  
City, State, Zip Code

619-688-5848  
Phone Number

info@PacificPetro.com

Toby Argandona 6-27-05  
Signed by Date  
(Company Representative)

Toby Argandona  
Printed Name (Company Representative)

CNI Manufacturing  
Equipment Manufacturer Name

15627 Arrow Hwy.  
Mailing Address

Irwindale, CA 91706  
City, State, Zip Code

626-962-6646  
Phone Number

info@cni-mfg.com



<sup>1</sup> This certification statement is part of the guidelines developed by the California Air Resources Board (ARB) and State Water Resources Control Board (State Water Board) to implement provisions of Assembly Bill 2935 (Statutes 2004, Chapter 649: McCarthy).

<sup>2</sup> This certification is based on the presumption that the <Name of EVR System> is constructed, installed, maintained, and operated in accordance with all applicable requirements of Chapter 6.7 of California Health and Safety Code and Chapter 16 of the California Code of Regulations.